Message

From: Bacey, Juanita@DTSC [Juanita.Bacey@dtsc.ca.gov]

 Sent:
 11/2/2017 5:14:53 PM

 To:
 LEE, LILY [LEE.LILY@EPA.GOV]

Subject: Fw: Hunters Point Naval Shipyard Site

From: Nazemi, Mohsen@DTSC

Sent: Thursday, November 2, 2017 9:16:29 AM

To: Naito, Janet@DTSC; Selzer, Brooke@DTSC; Leclerc, Ray@DTSC; Lofstrom, Dot@DTSC

Cc: Pettijohn, Julie@DTSC; Bacey, Juanita@DTSC **Subject:** RE: Hunters Point Naval Shipyard Site

Thanks Janet for the detailed email and update. I appreciate it. Have a nice day.

Mohsen Nazemi, M.S., P.E.

Deputy Director

Cal EPA/Department of Toxic Substances Control Brownfields & Environmental Restoration Program Cypress (714) 484-5321/Sacramento (916) 445-7076 (714) 484-5323 fax mohsen.nazemi@dtsc.ca.gov



From: Naito, Janet@DTSC

Sent: Wednesday, November 01, 2017 11:24 PM

To: Selzer, Brooke@DTSC <Brooke.Selzer@dtsc.ca.gov>; Nazemi, Mohsen@DTSC <Mohsen.Nazemi@dtsc.ca.gov>;

Leclerc, Ray@DTSC <Ray.Leclerc@dtsc.ca.gov>; Lofstrom, Dot@DTSC <Dot.Lofstrom@dtsc.ca.gov>

Cc: Pettijohn, Julie@DTSC <Julie.Pettijohn@dtsc.ca.gov>; Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>

Subject: Hunters Point Naval Shipyard Site

Outlined below is are my meeting notes.

11-1-2017 Meeting with US EPA, Navy, Water Board, DTSC & CDPH

Navy is concerned by the draft comments received on the radiological reevaluation report for Parcel G. The Navy is still working on an overall sampling workplan. However, they do not want to submit something that will be rejected by the Agencies. Based upon the comments received, the Navy believes that they and Agencies are far apart in their thinking on the path forward.

Navy proposed classifying trenches as Class 3 survey units since the source (storm drain line) has been removed. They stated that these were classified as Class I survey units to accelerate their remediation and they believe that they should have been Class III survey units. Navy proposes to collect a maximum of 18 samples per survey unit using direct push borings to address the trench and fill questions. They want to compare the data collected to an updated release criteria set using MARSSIM protocol. The updated release criteria would be based upon a survey unit-wide average with a not-to-exceed maximum. They think that

reestablishing the release criteria would be within the scope of the Action Memo criteria (adding 1 to the mean concentration). The would add a NORM analysis to augment past work. They would also conduct additional evaluation of samples that exceed the release criteria to determine if they are within the background range.

The Agencies clarified that our staff have focused on the report review and reevaluation of the existing data. We have not focused on the next steps. Based upon what was found during the review process, the Agencies believe the Navy would need to excavate and rescan the fill material within trenches in order to demonstrate that they have met the ROD objectives/requirements. This is the first time the Agency managers have heard the Navy's idea of reclassifying the survey units.

The Agencies expressed some concerns about the Navy's proposal. We acknowledged that we needed to get input from our technical staff to better understand the what potentially reclassifying survey units from 1 to 3 means and whether we think doing this would still allow us to meet the ROD requirements. This evaluation may show that different approaches are needed for different areas. We also need input from our technical teams on the Navy's proposal to reassess the release criteria. We will also ask our technical staff about potential options.

Path Forward: The Agencies will followup with our technical staff, then set up a conference call at 3 p.m. next Tuesday to let the Navy know initial results.

US EPA indicated that Greg Vlasic with CalEPA has contacted Enrique at US EPA regarding cleanup goals for radioactive isotopes. Navy indicated that this likely follows up their reaching out to the Governor's Office regarding the need for cleanup goals for radioactive isotopes in California.